UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

JULIAN SILVA, ET AL

Plaintiffs,

v.

JOSE VAZQUEZ COFRESI, ET AL

Defendants.

JOSE VAZQUEZ

Counterclaimant,

v.

JULIAN SILVA

Counterclaim Defendant

ECF CASE

Case No. 13-cv-3200-CM

AFFIDAVIT OF MICHAEL D. STEGER IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL

I, Michael D. Steger, affirm as follows:

- 1. I am counsel for defendants Jose Vazquez and Handle With Care Productions, Inc. in this action. I am licensed to practice law in New York. I am competent to testify as to all matters contained in this Affirdavit, and if called as a witness herein, I would testify hereto. I submit this Affdavit in support of my Motion to Withdraw as counsel for Defendants.
- 2. Handle With Care Productions, Inc. was a New York business corporation that was dissolved by Mr. Vazquez in 2012. Discovery in this case has revealed that Handle With Care Productions, Inc. has no assets. Attached as Exhibit 1 is a true and correct printout from the New York Secretary of State's website showing that Handle With Care Productions, Inc. has been dissolved.
- 3. On December 5, 2013, a member of Mr. Vazquez's family informed me that Mr. Vazquez wished me to withdraw as his counsel in this action. On December 11, 2013, Mr. Vazquez confirmed to me that he was terminating my representation of him in this action.

- 4. On December 5, 2013, I notified Mr. Vazquez, by email and regular mail, first class postage prepaid, of all pending deadlines in this case, including the close of discovery on January 17, 2014, and the required submission of a joint pretrial order by February 14, 2014. I also sent Mr. Vazquez a copy of the most recent scheduling order in this case.
- 5. Steger Krane LLP intends to assert a retaining lien over Defendant's file in this case, pending payment of outstanding fees and expenses, including fees for deposition transcripts.

I affirm under penalty of perjury under the laws of the State of New York that the foregoing is true and correct. Executed this 12th day of December, 2013 at Orangeburg, New York.

Michael D. Steger

TAISA PARENTE

Notary Public, State of New York

No. 01PA6128826

Qualified in Rockland County

Commission Expires June 20, 2009

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